

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CASE NO. 1:23-CV-00020-MR-WCM

Clara M. Mann
_____)
_____)
Plaintiff(s), _____)
v. _____)
_____)
Trails Carolina, LLC _____)
_____)
Defendant(s). _____)

SUPPLEMENTAL AMENDED DISCLOSURE BY PARTY OR INTERVENOR
IN A DIVERSITY CASE

This disclosure must be filed on behalf of each party or intervenor to an action in which jurisdiction is based on diversity under 28 U.S.C. § 1332(a). Counsel has a continuing duty to update this information. An executed form should be electronically filed. The disclosing party must file this disclosure at the time of the party's first appearance, pleading, petition, motion, response, or other request addressed to the Court. The disclosing party also must serve this form on the other parties to the action.

Trails Carolina, LLC _____ who is Defendant _____
(Name of Party) (Plaintiff / Defendant/Movant/Intervenor)

makes the following disclosures:

1. Is the party identified above an individual?

___ YES ☒ NO

If the answer is "YES," identify the State citizenship of that individual:

If the answer is "NO," proceed to question No. 2 below.

2. Identify the name and State citizenship of every individual or entity whose citizenship is attributable¹ to the party identified above:

| Name of Individual/Entity | Citizenship |
|---------------------------|-------------|
| See attached | |
| | |
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| | |
| | |

s/ David L. Levy
Signature of Attorney

08/16/2023
Date

¹ “For purposes of diversity jurisdiction, the citizenship of a limited liability company . . . is determined by the citizenship of all of its members.” Cent. W. Va. Energy Co., Inc. v. Mountain State Carbon, LLC, 636 F.3d 101, 103 (4th Cir. 2011). When members are LLCs themselves, the citizenship issues must be traced through until one reaches only individuals and/or corporations. See Jennings v. HCR ManorCare, Inc., 901 F.Supp.2d 649, 651 (D.S.C. 2012) (“an LLC’s members’ citizenship must be traced through however many layers of members there may be”).

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**DEFENDANT TRAILS CAROLINA, LLC'S SUPPLEMENTAL AMENDED
DISCLOSURE BY PARTY OR INTERVENOR IN A DIVERSITY CASE**

1. Wilderness Training & Consulting, LLC is the sole member-manager of Defendant Trails Carolina, LLC. Wilderness Training & Consulting, LLC is a limited liability corporation organized and existing under the laws of the State of Oregon.

2. WTCSL, LLC is the sole member manager of Wilderness Training & Consulting, LLC. WTCSL, LLC is a limited liability corporation organized and existing under the laws of the State of Oregon.

3. WTCSL, LLC has the following members: Cat Jennings (NC); Dilly Bean LLC (member: Bryan Tomes (NC)); FNS Group, LLC (member: Dan Stuart (UT)); Graham Shannonhouse (NC); Hayden Dupell (OR); Ikaika Holdings LLC (member: Keoni Anderson (UT)); Jen Wilde Consulting PLLC (member: Jennifer Wilde (UT)); Jesse Long (OR); John Gordon (NC); Jon Worbets (ID); Kathryn Huffman (NC); Kathy Rex (ID); Kirsten Morgan (OR); Laura Burt (UT); Mahalo Nui, LLC (member: Judith Jacques (UT)); Mary S. Pierce (NC); Matt Roy (OR); Randi Nelson (UT); Rebecca Gebb (NC); Reid Treadaway (ID); Scott Hess (UT); SEJC Holdings, LLC (member: Kyle Gillett (NC)); Shayne Gallagher (UT); Sheri Gallagher (UT); Simpson Holdings, L.C. (members: Jeff and Becky Simpson (AZ)); Steven Stradley (OR); White Mountain Consulting LLC (member: Josh White (AZ)); and WTC Holdco, LLC.

4. WTC Holdco, LLC is a limited liability corporation organized and existing under the laws of the State of Oregon. WTC Holdco, LLS has the following members: Wayne Laird (OR); JLC Family, LLC (member: Johnny Deblock (WA)); Opal Creek Capital, LLC (member: Tim Dupell (OR)); PGO, LLC (member: Sue Crowell (NC)); and FHW/THP Blocker, Inc. (TX private equity firm).

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5. Defendant Trails Carolina, LLC affirmatively represents to the Court that, in tracing the corporate and individual entities in levels below Trails Carolina, LLC, including without limitation those detailed herein, all are citizens of states other than South Carolina.

6. Plaintiff is a citizen of the State of South Carolina. Defendant acknowledges that there is complete diversity of citizenship between Plaintiff on the one hand and Defendant and the affiliated entities referenced herein.